

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Schools and Libraries Universal Service ) CC  
Docket No. 02-6  
Support Mechanism )  
 )

COMMENTS ON  
"COMMENTS OF GENERAL COMMUNICATIONS, INC."  
by  
LOWER KUSKOKWIM SCHOOL DISTRICT, ALASKA

**Author: Ted Berry - Technology Coordinator**

The Lower Kuskokwim School District (LKSD) is a customer of General Communications Inc (GCI) for Internet and Distance Learning services. The school district provides two separate video conferencing systems and Internet services per school to twenty-seven sites in an area bigger than some entire states in the "lower 48". It receives E-rate discount on eligible services.

Up to May this year, LKSD had fully functioning and stable videoconference and Internet systems. However, at that time GCI reduced the number of connections per site between their on-site equipment and school equipment, to one connection. Previously there had been two connections to each site, one for data and one for video. Since the change to one connection per site was made, the school district has intermittent and totally inadequate video conferencing and

Internet services. Consequently, students are not receiving adequate instruction.

As I understand it, the change to one connection was made because the Schools and Libraries would not approve approximately \$2 million dollars of E-rate discounts for funding year 2004-2005 until the changes were made. The technical and legal details of eligibility requirements imposed by the SLD (using the Eligible Services List) which led to the changes, are detailed in the GCI submission referred to in this document. The rationale behind this requirement is difficult to comprehend where it concerns distance learning in bush Alaska. Compliance was costly and the results appear to be detrimental to the proper functioning of LKSD technology systems and therefore to student progress.

There are no roads between the district's Eskimo village sites and most of the school year the region is frozen solid. Transport is via plane, snow machine, or to some schools, motor vehicle on frozen rivers, weather permitting. The district relies heavily on distance learning. There are two videoconferencing studios at the district office from which lessons are presented to several schools simultaneously each day. Prior to this change, students used the Internet for web-based courses but these courses cannot be accessed under the present circumstances. This technology is used to comply with the "No Child Left Behind" Act, especially where it concerns "highly qualified teachers". It is not practical, or within the

LKSD budget, to provide "highly qualified teachers" in all content areas to all sites in view of the low student numbers in some schools. The current distance learning systems could not be provided without E-rate support.

We are in the second week of semester and unless our technology systems are able to function satisfactorily, schools have no choice but to return to a system of site-based teachers with insufficient qualifications in order to maintain continuity of classes. I urge the FCC to reconsider this requirement.